

Conflict Minerals Policy

REVISION HISTORY

Revision	Description of Change	Writer/Reviser	Effective Date
1.0	New Document Release	Park Kyu Jin	12 th Dec.2012
1.1	EICC → RBA (Responsible Business Alliance)	Park Jin Hyeong	08 th Feb.2024

APPROVERS

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1. BACKGROUND/INTRODUCTION

- 1.1. The United Nations Group of Expert on the Democratic Republic of Congo (DRC) found that the trade of certain minerals (Columbite-Tantalite (Coltan/Tantalum), Cassiterite (Tin), Wolframite (Tungsten) and Gold), called conflict Minerals (3TG), is helping to finance the civil conflict in the DRC characterized by extreme levels of violence, particularly sexual-and gender-based violence.
- 1.2. In July 2010, US President Barack Obama signed the “Dodd-Frank Wall Street Reform and Consumer Protection Act” that includes section 1502(b) on Conflict Minerals.
- 1.3. US Securities and Exchange Commission (SEC) released final rules on August, 2012 requiring all public companies to disclosure and report annually to the Securities and Exchange Commission (SEC) if the minerals they use in their products (Tin, Tantalum, Tungsten and Gold, so called 3TG), originated from the DRC and adjoining countries.

2. PURPOSE

- 1.1. This document contains KEC Corporation’s policy regarding Conflict Minerals in our supply chain. KEC Corporation supports the action and has partnered with Responsible Business Alliance (RBA) / Global e-sustainability Initiative (GeSI) team to collaboratively develop an industry standard to collect the sourcing information related “Conflict Minerals”.

3. SCOPE

- 1.1. This document defines KEC Corporation’s due diligence requirement and expectation of our supply chain.

4. POLICY STATEMENT

KEC Corporation Conflict Minerals Policy

“Conflict Minerals” refers to minerals or other derivatives mined in the eastern provinces of the Democratic Republic of the Congo (DRC) and in the adjoining countries where revenues may be directly or indirectly financing armed groups engaged in civil war resulting in serious social and environmental abuses. In July 2010, the United States passes HR4173, the Dodd-Frank Financial Reform Bill section 1502(b) requiring all US stock listed companies and their suppliers to disclose the chain of custody usage of conflict minerals (Tin, Tantalum, Tungsten, and Gold . . . 3TG).

KEC Corporation fully supports this legislation and the Responsible Business Alliance (RBA) /Global e-Sustainability Initiative (GeSI) position to assure that specified minerals are not being sourced from mines in the “Conflict Region”, which is controlled by non-government military groups. Furthermore, KEC Corporation intends to adopt the RBA reporting process and obtain chain of custody declarations from all **KEC Corporation** sourced and managed suppliers ensuring transparency in our supply chain.

- **KEC Corporation** expects our suppliers to source materials from socially responsible suppliers. This means we not only source from regular suppliers using sources from other regions but also source with suppliers who have confirmed non-conflict sources even if those sources do come from the DRC and surrounding area.
- **KEC Corporation** expects all its suppliers to comply with the Dodd-Frank regulation and provide all necessary declarations.
- Suppliers must pass this requirement on to their supply chain if they don't source directly from smelters and determine the source of specified minerals.
- Suppliers who are non-compliant to these requirements shall be reviewed by Global Commodity Management for future business.

This Conflict Minerals policy is in line with the Global Business Initiatives on Human Rights, of which **KEC Corporation** is a member, and the framework of the United Nations Principles of Human Rights encouraging governments and businesses to respect, protect and remedy human rights.
